

EXHIBIT B



Sam Hoefs <shoefs@nighgoldenberg.com>

Subpoena to Lyft

1 message

Sam Hoefs <shoefs@nighgoldenberg.com>

Fri, May 10, 2024 at 1:57 PM

To: driskin@wc.com, UberMDLDiscovery@chaffinluhana.com, mshortnacy@shb.com, vgromada@shb.com, decummings@shb.com

Hi David,

It was nice talking to you just now. As we discussed, we are planning to take this process one step at a time. I have attached a copy of the Protective Order so that you can assess your ability to produce your client's internal communications in light of the protections available. During our meeting you stated that you believed Plaintiffs should obtain the documents requested directly from Uber and that it was Uber's responsibility to identify individuals who communicated with Lyft about the subject matter of the requested documents including specifically the Industry Sharing Safety Program, coordinated lobbying efforts, and sexual assault generally. Accordingly, I am copying Uber's counsel and through this email requesting that Uber do so. Further, through the sending of this email, Plaintiffs request that Uber's counsel send us the documents requested in our subpoena directed to Lyft, which I have attached for reference.

Our understanding is that Lyft can produce documents electronically, making the place of production irrelevant. However, if you would like us to re-serve the subpoena, we will be happy to re-serve the subpoena with the place of production being Walkup Law Office, 650 California St, 26th Fl, San Francisco CA, 94108. Plaintiffs will work with Lyft on the timing of compliance, provided Lyft can commit to being cooperative in complying with the subpoena.

We look forward to meeting with you next Friday at 10 am EST to continue our discussion.

Thanks,

Sam Hoefs

Associate Attorney



Nigh Goldenberg Raso & Vaughn, PLLC
60 South Sixth Street
Suite 2800
Minneapolis, MN
55402

D - (612) 445-0202

T - (202)-792-7927

F - (202)-792-7927

nighgoldenberg.com[Schedule a meeting!](#)

2 attachments

Notice - Lyft.pdf
152K **Uber Protective Order.pdf**
170K